

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA**

IN RE:	:	CHAPTER 7
	:	
JESSE J. COVERSON,	:	CASE NO. 10-54054 JDW
	:	
Debtor	:	
	:	
WILLIAM M. FLATAU, TRUSTEE,	:	
	:	
Movant	:	
	:	
vs.	:	
	:	
JESSE J. COVERSON,	:	
	:	
Respondent	:	

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**NOTICE OF TRUSTEE'S MOTION FOR TURNOVER OF PERSONAL PROPERTY**

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WILLIAM M. TRUSTEE, TRUSTEE, HAS FILED HIS TRUSTEE'S MOTION FOR TURNOVER OF PERSONAL PROPERTY. A COPY OF SAID MOTION IS ATTACHED HERETO.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)**

IF YOU DO NOT WANT THE COURT TO GRANT THE MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, YOU MUST FILE A WRITTEN OBJECTION OR BEFORE **OCTOBER 24, 2011**. IF AN OBJECTION IS FILED, A HEARING HAS BEEN SCHEDULED FOR THE **21st DAY OF NOVEMBER, 2011 AT 9:30 O'CLOCK A.M.** IN COURTROOM B, 433 CHERRY STREET, MACON, GEORGIA. IF YOU MAIL YOUR OBJECTION TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL **RECEIVE** IT ON OR BEFORE THE DATE STATED ABOVE TO: CLERK, UNITED STATES BANKRUPTCY COURT, POST OFFICE BOX 1957, MACON GA 31201. ANY OBJECTION MUST ALSO BE MAILED TO THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY ENTER AN ORDER GRANTING THAT RELIEF.

DATED THIS 3<sup>rd</sup> DAY OF OCTOBER, 2011.

355 Cotton Avenue  
Macon, Georgia 31201  
(478) 742-6481

KATZ, FLATAU & BOYER, L.L.P.

By:

  
WILLIAM M. FLATAU

State Bar No. 262800

Attorney for Trustee

IN THE MATTER OF:

## Debtor

## Movant

**VS.**

Respondent

## CHAPTER 7

CASE NO. 10-54054 JDW

COMES NOW William M. Flatau, trustee ("Trustee" or "Movant"), and in support of this motion respectfully shows as follows:

1.

Movant is the duly qualified and acting Trustee in the Chapter 7 case of Jesse J. Coverson (“Mr. Coverson”). Mr. Coverson is subject to the jurisdiction of this court.

2.

This proceeding is one arising in the debtor's case number 10-54054 under Chapter 7 of Title 11 now pending in this court. This court has jurisdiction over this proceeding under 28 U.S.C. § 1334 and 11 U.S.C. §§ 521 and 542.

3.

An order for relief was entered in Mr. Coverson's Chapter 13 case on December 3, 2010. The case was converted to one under Chapter 7 on February 22, 2011.

4.

Mr. Coverson is in possession of a certain 2004 Chevrolet Silverado pickup truck, a Triton bass boat, motor and trailer and a riding mower ("Personal Property").

5.

The Personal Property is 11 U.S.C. § 541 property of the estate.

6.

The Trustee has previously sought turnover of the Personal Property, but Mr. Coverson has failed to surrender said Personal Property to him.

7.

Pursuant to 11 U.S.C. §§ 521 and 542, Mr. Coverson should cooperate with Plaintiff and turnover to the Trustee said Personal Property.

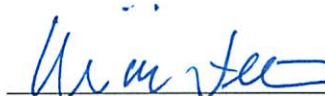
WHEREFORE, the Trustee prays that:

(a) Mr. Coverson be ordered to turnover said Personal Property; and

(b) he have such other and further relief as is just.

KATZ, FLATAU & BOYER, L.L.P.

By:



WILLIAM M. FLATAU

State Bar No. 262800

Attorney for Plaintiff

355 Cotton Avenue  
Macon, Georgia 31201  
(478) 742-6481

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**CERTIFICATE OF SERVICE**

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This is to certify that I have this day served a copy of the

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**NOTICE OF TRUSTEE'S MOTION FOR TURNOVER OF PERSONAL PROPERTY**

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upon the following:

Office of the U.S. Trustee  
440 Martin Luther King, Jr. Blvd., Suite 302  
Macon, Georgia 31201

Michon D. Walker, Esq.  
Post Office Box 64  
Sandersville, Georgia 31061

via the court's electronic notification system.

I have also served said notice on the following:

Jesse J. Coverson  
Post Office Box 255  
Milledgeville, Georgia 31061

by depositing a copy of the same in the United States mail, first class, in properly  
addressed envelopes with sufficient postage affixed thereto.

This 3<sup>rd</sup> day of October, 2011.

  
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WILLIAM M. FLATAU